

EXHIBIT K

In re: MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al., No. 09-50026

Plaintiffs and Participating Unitholders' Affirmative Designations of the Deposition
Testimony of Keith Martorana and the GUC Trust and New GM's Objections Thereto

Keith Martorana November 20, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
9:21	11:14	
12:9	13:15	
13:17	14:10	
23:11	23:15	Vague and ambiguous; Lack of foundation (FRE 602) (23:12-15).
23:19	23:20	Vague and ambiguous; Lack of foundation (FRE 602).
25:11	25:16	
25:19	25:25	Lack of foundation (FRE 602) (25:23-25:25).
26:4	27:1	Lack of foundation (FRE 602) (26:4-7; 26:22-25).
27:6	27:19	Lack of foundation (FRE 602).
32:11	33:25	
35:9	35:12	Lack of foundation (FRE 602).
35:15	36:4	Lack of foundation (FRE 602) (35:15-18).
36:11	36:12	
37:11	38:7	
38:16	38:18	
38:22	39:15	Lack of foundation (FRE 602) (39:10-15).
39:18	43:6	Lack of foundation (FRE 602) (39:18-25; 42:25-43:6).
43:10	43:13	Lack of foundation (FRE 602).
51:25	52:2	Lack of foundation (FRE 602).
52:5	53:19	Lack of foundation (FRE 602) (52:5-9; 53:14-19).
53:24	54:4	Lack of foundation (FRE 602).
58:2	60:2	
60:16	61:8	
66:21	67:7	
67:18	68:3	

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
68:17	69:9	
69:11	69:19	
71:1	72:22	
73:17	73:20	
74:4	74:12	
75:21	76:8	Vague and Ambiguous; Lack of foundation (FRE 602).
76:14	77:8	Vague and Ambiguous; Lack of foundation (FRE 602) (76:14-16).
83:9	83:23	Relevance.
84:16	85:15	Relevance.
85:22	86:1	Relevance; Incomplete quotation; Lack of foundation (FRE 602).
86:11	88:4	Relevance (86:11-88:4); Incomplete quotation; Lack of foundation (FRE 602) (86:11-25); Mischaracterizes testimony (88:1-4).
88:8	88:10	Relevance; Lack of foundation (FRE 602); Mischaracterizes testimony.
92:14	92:19	Lack of foundation (FRE 602); Mischaracterizes testimony.
92:24	93:2	Lack of foundation (FRE 602); Mischaracterizes testimony.
103:22	104:1	Lack of foundation (FRE 602).
104:5	104:6	Lack of foundation (FRE 602).
106:19	106:25	Lack of foundation (FRE 602); Mischaracterizes testimony.
107:4	107:10	Lack of foundation (FRE 602); Mischaracterizes testimony.
107:18	107:22	Lack of foundation (FRE 602).
108:1	108:6	Lack of foundation (FRE 602).
109:15	109:24	Lack of foundation (FRE 602); Mischaracterizes testimony.
110:6	110:8	Lack of foundation (FRE 602); Mischaracterizes testimony; designation is incomplete (it begins half-way through the witness' answer).
111:14	112:14	Attorney colloquy; Lack of foundation (FRE 602) (112:12-14).

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
112:16	112:19	Attorney colloquy; Lack of foundation (FRE 602).
112:23	113:25	Attorney colloquy; Lack of foundation (FRE 602) (112:23-25); Mischaracterizes testimony (113:19-25).
114:5	114:10	Lack of foundation (FRE 602); Mischaracterizes testimony.
115:15	116:9	Vague and ambiguous; designation is incomplete (does not contain witness' answer) (116:8-9).
116:13	116:14	Vague and ambiguous; designation is incomplete (does not contain witness' answer).
116:17	116:21	
118:7	118:13	Relevance.
123:23	124:7	Relevance.
125:17	125:20	Relevance.
125:25	125:25	Relevance.
126:13	126:16	Relevance; Vague and ambiguous.
126:20	128:10	Relevance (126:20-128:10); Vague and ambiguous (126:20); Lack of foundation (FRE 602); Mischaracterizes testimony (128:7-10).
128:14	129:2	Relevance (128:14-129:2); Lack of foundation (FRE 602); Mischaracterizes testimony (128:14-16); Lack of foundation (FRE 602); Calls for speculation (128:24-129:2).
129:6	129:25	Relevance (129:6-25); Lack of foundation (FRE 602); Calls for speculation (129:6-7; 129:21-25).
130:5	130:23	Relevance (130:5-23); Lack of foundation (FRE 602); Calls for speculation (130:5-8).
131:19	132:7	Relevance (131:19-132:7); Lack of foundation (FRE 602); Mischaracterizes testimony (132:3-7).

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
132:10	132:20	Relevance; Lack of foundation (FRE 602); Mischaracterizes testimony.
133:12	133:15	Relevance.
134:20	135:25	Relevance.
141:22	142:7	
148:25	149:12	Relevance (148:25-149:12); Vague and ambiguous; Lack of foundation (FRE 602) (149:7-12).
149:15	149:18	Relevance; Vague and ambiguous; Lack of foundation (FRE 602).
155:7	155:11	
176:17	178:6	Relevance.
178:20	179:23	Relevance.
183:23	183:25	Relevance (183:23-25); Lack of foundation (FRE 602); Calls for speculation (183:24-25) .
184:4	184:19	Relevance (184:4-19); Lack of foundation (FRE 602); Calls for speculation (184:4-11); Vague and ambiguous (184:13-19).
184:23	184:23	Relevance; Vague and ambiguous; Lack of foundation (FRE 602).
194:14	196:1	Relevance (194:14-196:1); Lack of foundation (FRE 602); Mischaracterizes testimony; Calls for speculation (195:23-196:1).
196:9	197:8	Relevance (196:9-197:8); Lack of foundation (FRE 602); Mischaracterizes testimony; Calls for speculation (196:9-12).
197:11	197:19	Relevance.
200:21	200:22	Not Testimony
204:5	204:6	Not Testimony
216:8	216:9	Not Testimony
235:14	235:22	Relevance (235:14-22); Lack of foundation (FRE 602); Compound (235:14-22).
236:1	236:23	Relevance (236:1-23); Lack of foundation (FRE 602); Compound (236:1-3).

GUC Trust and New GM's Counter Designations of the Deposition Testimony of Keith Martorana and the Plaintiffs and Participating Unitholders' Objections Thereto

Keith Martorana November 20, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
14:12	14:22	This is not a valid counter-designation, as neither completeness or fairness requires that this designation be considered contemporaneously with the designations (FRE 106); foundation/ lacks personal knowledge (FRE 601, 602).
27:21	28:4	This is not a valid counter-designation, as neither completeness or fairness requires that this designation be considered contemporaneously with the designations (FRE 106); Hearsay (801, 802)
35:13	35:14	Improper designation of counsel objection
36:9	36:10	Improper designation of counsel objection
60:3	60:13	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation / personal knowledge (601, 602); vague and ambiguous; speculation.
73:21	74:2	Not a valid counter-designation, as neither completeness or fairness requires that this designation be considered contemporaneously with the designations (FRE 106); lacks personal knowledge / foundation (601, 602); speculation
78:12	79:4	First off, this is out-of-context and incomplete in and of itself (106); second, even if it were "complete" by itself, this is not a valid counter-designation to any of the content affirmatively designated (106); hearsay (801, 802); lacks

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
		foundation/ personal knowledge (601, 602); 401-403; speculation/ vague and ambiguous.
79:15	80:14	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation / personal knowledge (601, 602); calls for speculation.
80:25	81:13	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (FRE 106); lacks foundation/ personal knowledge (FRE 601, 602).
88:11	88:16	Hearsay (801, 802); lacks foundation/ personal knowledge and is vague and ambiguous ("we did not feel it was appropriate...")
92:21	92:23	Improper designation of counsel objection
93:3	93:6	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/ personal knowledge (601, 602); relevance (401-403); hearsay (801, 802)
93:13	93:18	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/ personal knowledge (601, 602); relevance (401-403); hearsay (801, 802)
93:21	94:16	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/ personal knowledge (601, 602); relevance (401-403); hearsay (801, 802)

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
108:8	108:9	Not a valid counter-designation for completeness or fairness purposes (FRE 106).
108:15	109:14	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/personal knowledge (601, 602); improper opinion (701, 702); hearsay (801, 802); vague and ambiguous; more prejudicial than probative/ waste of time (401-403).
110:3	110:5	
129:4	129:5	Improper designation of counsel objection
130:1	130:2	Improper designation of counsel objection
132:8	132:9	Improper designation of counsel objection
149:13	149:14	Improper designation of counsel objection
154:1	155:6	Not a valid counter-designation for completeness or fairness purposes (FRE 106); hearsay (801, 802); 401-403 (more prejudicial than probative); lacks foundation/personal knowledge (601, 602); improper opinion (701, 702)
184:25	185:11	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation (601, 602); calls for speculation.
185:15	185:23	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation (601, 602); more prejudicial than probative/ confuses the issues/ waste of time (401-403); calls for speculation.
186:2	186:8	Not a valid counter-designation and is moreover incomplete on its own

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
		because it omits the answer to the question (106); even if it were "complete" by itself, this is not a valid counter-designation to any of the content affirmatively designated (106); lacks foundation (601, 602); 401-403 (more prejudicial than probative/ confusion of the issues/ waste of time); calls for speculation.
186:11	186:20	Not a valid counter-designation and is moreover incomplete on its own and out of context (106); includes improper record objections; 401-403 (more prejudicial than probative/ confusion of the issues/ waste of time); calls for speculation; lacks foundation/ personal knowledge (601, 602).
200:6	200:20	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); lacks foundation/ personal knowledge (FRE 601, 602); 401-403.
200:23	201:25	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); 401-403, 801, 802, 701, 702, Lacks foundation (601, 602)
202:12	203:3	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); 401-403

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
		(more prejudicial than probative/confusion of the issues); hearsay
203:8	203:18	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); further, it is in and of itself incomplete, as it omits the answer to the designated question on line 19 (106); 401-403 (more prejudicial than probative/confusion of the issues).
203:20	204:4	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); further, it is in and of itself incomplete, as it omits the answer to the designated question on line 19 (106); 401-403 (more prejudicial than probative/confusion of the issues); improper opinion (701, 702).
204:7	204:23	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); improper opinion (701, 702); 401-403 (more prejudicial than probative/ confusion of the issues).
206:19	207:4	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); 401-403 (more prejudicial than probative/

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
		confusion of the issues); lacks foundation / personal knowledge (601, 602).
208:7	208:12	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); 401-403 (more prejudicial than probative/ confusion of the issues); lacks personal knowledge / foundation (601, 602); calls for speculation.
211:22	212:15	First off, this is out-of-context and incomplete in and of itself (106); second, even if it were "complete" by itself, this is not a valid counter-designation to any of the content affirmatively designated (106); lacks foundation/ personal knowledge (601, 602); 401-403; speculation/ vague and ambiguous.
214:10	215:9	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); hearsay (801, 802); 401-403 (more prejudicial than probative/ confusion of the issues); lacks foundation / personal knowledge (601, 602).
216:1	216:7	This is out-of-context and incomplete in and of itself (106); even if it were "complete" by itself, this is not a valid counter-designation to any of the content affirmatively designated (106); hearsay (801, 802); lacks foundation (601, 602); more prejudicial than probative/ confusion of the issues/

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Counter-Designation Begin	Counter-Designation Designation End	
		waste of time (401-403); improper opinion (701, 702).